

JILL GARCIA  
Nevada Bar No. 007805  
[jill.garcia@ogletreedeakins.com](mailto:jill.garcia@ogletreedeakins.com)  
ERICA J. CHEE  
Nevada Bar No. 12238  
[erica.chee@ogletreedeakins.com](mailto:erica.chee@ogletreedeakins.com)  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
Wells Fargo Tower, Suite 1500  
3800 Howard Hughes Parkway  
Las Vegas, NV 89169  
Telephone: 702.369-6800  
Fax: 702.369.6888  
*Attorneys for Defendant Sun Life Assurance  
Company of Canada*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

ANA TERESA PHILLIPS,

Plaintiff,

vs.

SUN LIFE ASSURANCE COMPANY OF  
CANADA; DOES I through X inclusive, and  
ROE CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:16-cv-02322-RFB-GWF

**STIPULATION AND ORDER TO EXTEND  
TIME TO AMEND COMPLAINT AND  
RESPOND TO COMPLAINT  
(First Request)**

Pursuant to LR IA 6-1, 6-2, and LR 7-1, Defendant, Sun Life Assurance Company of Canada ("Sun Life"), and Ana Teresa Phillips ("Plaintiff") by and through their undersigned counsel of record, HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. Plaintiff filed her Complaint in the instant action on August 18, 2016.
2. Sun Life filed its timely Notice of Removal with this Court on October 4, 2016.  
[ECF No. 1.]
3. Sun Life and Plaintiff conferred, through counsel, on or about October 6, 2016 regarding governing law of the claims asserted in the Complaint.

4. Sun Life and Plaintiff have agreed that this Court has federal question jurisdiction over the claims in the Complaint under the Employee Retirement Income Security Act of 1974, 29 U.S.C. § 1001 *et seq.* (hereinafter "ERISA");

5. Sun Life and Plaintiff have agreed to an extension of time for Plaintiff to amend her Complaint under ERISA. Therefore, Plaintiff's deadline to amend the Complaint is now **October 17, 2016**.

6. Sun Life and Plaintiff have agreed that Sun Life shall have twenty-eight (28) days from the Plaintiff's deadline to amend the Complaint, in which to respond. Therefore, Sun Life's deadline to respond to the Complaint is now **November 14, 2016**.

7. This is the parties' first request to extend the deadlines.

8. This request is made in good faith, and not for purposes of delay.

IT IS SO STIPULATED:

Dated: THIS 10<sup>TH</sup> DAY OF OCTOBER, 2016.

By: /s/ Cory M. Jones

Cory M. Jones  
Jones Wilson LLP  
1522 W. Warm Springs Road  
Henderson, Nevada 89014  
*Attorneys for Plaintiff Ana Teresa Phillips*

By: /s/Jill Garcia

JILL GARCIA  
Nevada Bar No. 007805  
ERICA J. CHEE  
Nevada Bar No. 12238  
OGLETREE, DEAKINS,  
NASH, SMOAK & STEWART, P.C  
Wells Fargo Tower  
3800 Howard Hughes Parkway, Suite 1500  
Las Vegas, NV 89169  
*Attorneys for Defendant Sun Life Assurance  
Company of Canada*

IT IS SO ORDERED:



RICHARD F. BOULWARE, II  
United States District Judge

DATED this 21st day of October, 2016.